

From: David Gingras <[REDACTED]>
Sent: Wednesday, May 08, 2024 3:35 PM
To: Gregg Woodnick <[REDACTED]>
Cc: Isabel Ranney <[REDACTED]>; Maribeth Burroughs
<[REDACTED]>
Subject: RE: Owens v. Echard

Gregg,

Just to follow up – I'm in the process of looking for a computer person in San Fran to look at Mike's laptop. Laura wants to move forward with that review, and while I'm not confident it will change anything, I do think it may help her remove doubts about what the laptop shows. That alone could be worth the effort.

As discussed, I'd also appreciate you setting up a call w/ Marraccini if you can. I guess there's also a technical issue with that – Mike is (to my knowledge) represented by Randy Sue Pollock, and I don't have her consent to talk with him. So if Mike is open to having a call

[REDACTED] (which I hope he is), I'd just need to make sure I have consent from his counsel to speak with him.

One last thing – after talking with Laura about this, she said she has lots of questions for Mike. I told her my preference is to have her send me any specific questions, and I'll see if Mike wants to answer them. She also said she's willing to speak directly with him, but that may not be appropriate in light of the restraining order. On the other hand, if Mike has a strong preference in favor of directly speaking with Laura, maybe we can make that happen (I'm licensed in CA and can probably do some sort of stipulation with Randy to modify the CA order to allow this, just to be safe).

P.S. This goes without saying, but to the extent I suggested Mike would be arrested if he comes to court in AZ, that suggestion is completely and totally withdrawn. I only said that because I didn't want Mike to show up without giving me the chance to at least interview him (as I would with *any* normal witness). As long as Mike agrees to have a reasonable call to answer to some questions, I'll stipulate and agree his appearance in AZ is NOT a violation of anything and will not expose him to arrest or any other legal consequences.

David Gingras, Esq.

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